



ORIGINAL

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Arizona Corporation Commission

Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

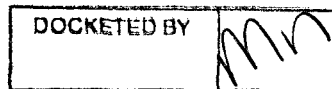
AZ CORP COMMISSION
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AUG 21 2009

re: Docket Number E-01345A-09-0263

Dear Commission:



Over the past several months we have been examining the possibility of adopting solar energy systems to reduce our utility costs through Solar Service Agreements. As the Commission is well aware, the availability of utility rebate incentives is absolutely vital in the economics of solar. Without these rebates most systems for schools are not economically feasible. Recently it has become apparent that due to the overwhelming interest in the commercial solar sector, it is highly uncertain whether any rebate incentive funds will be available for the systems proposed for Arizona's schools. Without a resolution on this matter school projects will likely never being funded.

Our District supports APS's request in this docket to allow rebate incentive funds that were previously allocated but would likely not be used for residential installations to apply to school projects. Without this reclassification, schools would likely not receive a utility incentive award under the APS commercial program and in turn would not be able to adopt solar power. Failure to properly resolve this matter would be wasting an opportunity that would potentially allow Arizona's schools and taxpayers to save millions in operating expenses through the adoption of solar energy systems over the next fifteen (15) to twenty-five (25) years. These are savings that could be used to improving classrooms or hiring teachers; dollars that are particularly vital in the face of Arizona's budget difficulties.

While APS's commercial program has been successful beyond expectations, the residential PV market is not sufficiently strong to demand its full funding allocation. We applaud APS for providing a short-term solution, like re-classifying the schools as residential assets. We concur with APS in its filing stating:

- A school is an asset to its residential community, funded by its residential community and embedded in its residential community. Therefore it reasons to recognize schools as residential.
- By allowing schools to be classified as residential, they will have access to millions of dollars that are likely to go unused, allowing them to proceed with their renewable projects in 2009. If their project can be completed by the end of 2009, the schools can then take advantage of the Federal Stimulus funding available through the ARRA.

Governing Board Members

Sandi Nielson, Board President
Kathy Reyes, Board Vice-President
Sally Maddux, Member
Jeannie Myrick, Member
Kelli Watson, Member

Superintendent

Roger S. Freeman, Ed.D.

Assistant Superintendent

Paul Tighe, Ed.D.

School Phone Numbers

Collier Elementary (623) 478-5900
Country Place Elementary (623) 478-6100
Estrella Vista Elementary (623) 478-6200
Littleton Elementary (623) 478-5700
Quentin Elementary (623) 478-6000
Tres Rios Elementary (623) 478-6300

- Without allowing schools to be classified as residential and affording them access to up-front incentives funds, many school projects are likely to go unfunded in 2009.
- With access to a portion of the residential incentive funds, schools can begin projects sooner. The sooner schools can install renewable energy and receive incentives, the sooner they can begin realizing a savings on their electric bills and the sooner those savings can be passed to residents in the community.
- Current residential PV markets are simply not sufficiently strong to demand their full funding allocation. A number of school districts have shown that they are eager to begin installing renewable systems in the near term, providing that incentives are available to them in order to make the projects cost effective.
- If additional funding is available to schools, more systems can be install throughout the state. The benefits would not only be economical, but also educational for the community and the students it serves.

We support APS and thank them for proposing a short-term solution that helps the schools in our effort to become green and sustainable. Without the reclassification we would not be able to take advantage of the federal incentives through a third party that will allow us to go green and potentially hedge our energy prices on a long term basis.

We encourage the Commission to grant this request, as this will help us become green, adopt solar and help drive Arizona into being the greenest state in the Nation.

Sincerely,
Everette E. Cole

School Representative
Everette E. Cole
Director of Operations

School District
Littleton Elementary School District